

**OFFICIAL FILE  
ILLINOIS COMMERCE COMMISSION**

**STATE OF ILLINOIS**

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**Illinois Commerce Commission**

**On Its Own Motion**

**Regulation of Meter Service Problems**

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**Docket 00-0182**

**PETITION TO INTERVENE**

Central Illinois Public Service Company and Union Electric Company (the "Ameren Companies") hereby petition the Illinois Commerce Commission (the "Commission"), pursuant to Section 200.200 of the Commission's Rules of Practice, for leave to intervene as parties in the above-captioned proceeding.

The Ameren Companies are engaged in the business of furnishing electric service in the State of Illinois, and each is a "public utility" within the meaning of Section 3-105 of the Public Utilities Act, 220 ILCS 5/1-101 et al., as amended. This proceeding was initiated to establish rules governing certification requirements and standards of service for meter service providers ("MSPs"), which will have the ability to provide unbundled meter service in the service areas of Illinois electric utilities, including the Ameren Companies. The Ameren Companies, therefore, have an interest in this proceeding. The Ameren Companies' interest in this proceeding cannot adequately be represented by any other party.

WHEREFORE, the Ameren Companies pray that they be granted leave to  
intervene and be treated as parties to this proceeding.

Dated: June 26, 2000

CENTRAL ILLINOIS PUBLIC SERVICE COMPANY  
UNION ELECTRIC COMPANY


By: 

Christopher W. Flynn  
Karl B. Anderson  
Jones, Day, Reavis & Pogue  
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Joseph H. Raybuck  
Ameren Services Company  
1901 Chouteau Avenue  
P.O. Box 66149  
St. Louis, Missouri 63166-6149  
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**CERTIFICATE OF SERVICE**

I, Karl B. Anderson, certify that on the 26th day of June, 2000 I caused copies of the foregoing Petition to Intervene and Comments of Illinois Public Service Company and Union Electric Company to be served on each of the persons listed on the attached service list via Federal Express delivery.



Karl B. Anderson

## SERVICE LIST

### DOCKET 00-0182

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|--|---|
| Bryan S. Anderson<br>Cynthia A. Fonner<br>Atty for Commonwealth Edison Company<br>Hopkins & Sutter<br>70 West Madison Street, Suite 4100<br>Chicago, IL 60602                                | Kevin Bennett<br>Business Manager<br>IBEW Local Union No. 1306<br>363 N. Sims Drive<br>Decatur, IL 62523  |
| Eric Bramlet<br>Koger & Bramlet, P.C.<br>316½ Market Street<br>P.O. Box 278<br>Mt. Carmel, IL 62863  | Linda M. Buell<br>Office of General Counsel<br>Illinois Commerce Commission<br>527 E. Capitol Avenue<br>Springfield, IL 62701   |
| Simone Byvoets<br>Commonwealth Edison Company<br>125 South Clark Street<br>Chicago, IL 60602   | Ward Camp<br>Phaser Advanced Metering Services<br>400 Gold SW, Suite 1200<br>Albuquerque, NM 87102  |
| Randy W. Clemens<br>Senior Attorney<br>Illinois Power Company<br>500 S. 27th Street<br>Decatur, IL 62521   | Joseph T. Clennon<br>Office of General Counsel<br>Illinois Commerce Commission<br>527 East Capitol Avenue<br>Springfield, IL 62701  |
| Leijuana Doss<br>Marie Spicuzza<br>Assistant States Attorney<br>Environment and Energy Division<br>Cook County State's Attorney's Office<br>69 W. Washington, Suite 700<br>Chicago, IL 60602 | David I. Fein<br>Christopher J. Townsend<br>Karen S. Way<br>Piper Marbury Rudnick & Wolfe<br>230 North LaSalle Street, Suite 1800<br>Chicago, IL 60601-1293                     |
| Edward C. Fitzhenry<br>Attorney for IIEC<br>Lueders, Robertson & Konzen<br>1939 Delmar Avenue<br>Springfield, IL 62040   | Gerard Fox, Esq.<br>Mary Klyasheff, Esq.<br>James Hinchliff, Esq.<br>Timothy P. Walsh<br>Peoples Energy Services Corporation<br>130 East Drive, 23rd Floor<br>Chicago, IL 60601 |

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| Edward J. Griffin<br>W. Michael Seider<br>Attys for Central Illinois Light Company<br>& Fiske<br>200 South Michigan Avenue, Suite 1100<br>Chicago, IL 60604                     | Michael W. Hastings<br>Atty for Intervenors<br>P.O. Box 3787<br>Springfield, IL 62708-3787   |
| Christopher T. Hexter<br>Charles Werner<br>Atty for IBEW, Local Nos. 15, 51, 702<br>and 1306<br>Schuchat, Cook & Werner<br>1221 Locust Street, 2nd Floor<br>St. Louis, MO 63103 | Steven Walter<br>City Planner V<br>Dept. of Environment<br>City of Chicago<br>30 North LaSalle, Suite 2500<br>Chicago, IL 60602-2580                                   |
| Robert P. Jared<br>Regulatory Law & Analysis<br>Midamerican Energy Company<br>106 E. Second Street<br>P.O. Box 4350<br>Davenport, IA 52808                                      | Ronald D. Jolly<br>Alan H. Neff<br>Assistant Corporation Counsel<br>Dept. of Law<br>City of Chicago<br>30 North LaSalle Street, Suite 900<br>Chicago, IL 60602-2580    |
| Robert Kelter<br>Citizens Utility Board<br>208 South LaSalle Street, Suite 1760<br>Chicago, IL 60604  | Joanna C. Kitto<br>Daniel J. Kucera<br>Attys for Schlumberger Resource<br>Management Services, Inc.<br>Chapman & Cutler<br>111 West Monroe Street<br>Chicago, IL 60603 |
| R. Lawrence Warren<br>Senior Assistant Attorney General<br>Public Utilities Bureau<br>100 West Randolph Street, 12th Floor<br>Chicago, IL 60601                                 | Kathy Lipp<br>Director - Regulation and Restructuring<br>Alliant Energy<br>P.O. Box 192<br>222 West Washington Avenue<br>Madison, WI 53701-0192                        |
| Mark T. Mitchell<br>Senior Vice President<br>Emeter Corporation<br>One Twin Dolphin Dr.<br>Redwood City, CA 94065   | Kent M. Ragsdale<br>Managing Attorney<br>Alliant Energy<br>P.O. Box 351<br>200 First Street SE<br>Cedar Rapids, IA 52406-0351  |

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| <p>Dominic Rivara<br/> Business Manager &amp; Financial Secretary<br/> IBEW Local Union No. 51<br/> 301 E. Spruce Street<br/> Springfield, IL 62703</p>           | <p>Gary Roan<br/> Business Manager<br/> IBEW Local Union No. 702<br/> 106 West Monroe Street<br/> West Frankfort, IL 62896</p>                                 |
| <p>George C. Roberts<br/> Schlumberger Resource Management<br/> Services, Inc.<br/> 5430 Metrie Place<br/> Norcross, GA 30092</p>                                 | <p>Nick T. Shea<br/> Director, Rates &amp; Regulatory Affairs<br/> 300 Liberty Street<br/> Peoria, IL 61602</p>  |
| <p>William H. Starr<br/> Business Manager, Financial Secretary<br/> IBEW Local Union No. 15<br/> 133 Butterfield Road, Suite 280<br/> Downers Grove, IL 60515</p> | <p>Christel Templeton<br/> Case Manager<br/> Illinois Commerce Commission<br/> P.O. Box 19280<br/> 527 East Capitol Avenue<br/> Springfield, IL 62794-9280</p> |
| <p>Michael Wallace<br/> Hearing Examiner<br/> Illinois Commerce Commission<br/> 527 East Capitol Avenue<br/> Springfield, IL 62701</p>                            | <p>Ms. Donna M. Caton<br/> Chief Clerk<br/> Illinois Commerce Commission<br/> 527 East Capitol Avenue<br/> Springfield, IL 62701</p>                           |